



Testimony  
Richard Smith  
First Selectman, Town of Deep River  
President, Connecticut Council of Small Towns  
Before the  
Planning & Development Committee  
February 13, 2013

**RE: HB-5725, An Act Concerning the Statewide Phosphorus Reduction Plan**

The Connecticut Council of Small Towns (COST) supports HB-5725, which calls for the state Department of Energy and Environmental Protection's (DEEP) to utilize a collaborative model in implementing Public Act 12-155 to develop a statewide approach to meeting EPA standards for phosphorus reduction.

More than 40 municipalities are facing multi-million dollar wastewater treatment plant upgrades in order to comply with DEEP's "interim" phosphorus discharge limits, which DEEP and U.S. EPA acknowledge are subject to revision in a few years. Because the proposed limits will be set forth in each plant's National Pollutant Discharge Elimination System (NPDES) permit, there is little opportunity to discuss and develop a statewide approach to phosphorus reduction to improve water quality. This permit-by-permit approach, which is not impacted by Public Act 12-155, imposes a significant burden on certain communities whose permits are up for renewal and creates considerable uncertainty as to how costly plant upgrades will help achieve compliance with statewide phosphorus reduction goals.

By utilizing a collaborative model, Public Act 12-155 will help ensure that the state develops a statewide plan for reducing non-point and point source phosphorus levels based on scientific methods. We are hopeful that this will help ensure that the state:

- 1) Explores less costly, viable treatment options available to municipalities;
- 2) Moves toward an integrated approach to water quality rather than the current piecemeal approach which results in municipalities spending millions of dollars to comply with what is admittedly a moving compliance target;
- 3) Provides municipalities with sufficient time to plan and finance plant upgrades necessitated by phosphorus reduction goals;
- 4) Bases phosphorus reduction goals on proven scientific methods to improve water quality; and
- 5) Alleviates some of the pressure on municipal wastewater plants by addressing non-point sources of phosphorus.

**COST therefore urges your support for HB-5725.**

*COST is an advocacy organization committed to giving small towns a strong voice in the legislative process. Its members are Connecticut towns with populations of less than 30,000. COST champions the major policy needs and concerns of Connecticut's suburban and rural towns. More information is available at [www.ctcost.org](http://www.ctcost.org).*

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